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Site:	<i>Wells GTH</i>
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July 21, 1994

BY HAND

Paula Fitzsimmons, Esq.
U.S. EPA - Region I
Waste Management Division
JFK Federal Building (HRS-CAN2)
Boston, MA 02203

	
SDMS DocID	548893

Re: UniFirst Corporation: Dispute Resolution

Dear Paula:

This letter memorializes our telephone conversation of Tuesday, July 12, 1994, concerning the dispute resolution process initiated on behalf of UniFirst Corporation by Jeffrey Bates's June 27, 1994 letter to Attorney Gretchen Muench. Our direct communications were authorized by Gretchen in a conference call she convened on Monday, July 11, 1994, in which Mary Garren also participated. I understand that, during Gretchen's absence on vacation, you and I may communicate freely, except when you believe a representative of the Regional Counsel's office should be included.

The resolution we discussed is as follows: In lieu of further compliance with the agency's directives set forth in a June 13, 1994 letter from Mary Garren to UniFirst's project manager Jeffrey Lawson, UniFirst will submit a report to EPA on or about August 31, 1994. At a minimum, the report will include the following particulars:

- A comprehensive presentation and interpretation of all the data that have previously been submitted in so-called "interim reports" in response to agency comments provided by Barbara Newman in March 1993 and by your letter of July 12, 1994.
- An explanation and justification of the conclusions concerning the need for, and the viability of, implementing soil vapor extraction ("SVE") on the UniFirst property that were presented orally to representatives of EPA's technical team at the June 13, 1994 meeting.
- A summary of UniFirst's interpretation of the references in the relevant decision documents to soil remediation, including the technical implications of these provisions.

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- A proposal to address any significant risks posed by contaminants remaining in the unconsolidated deposits on UniFirst's property, including an evaluation of the potential for infiltration of potassium permanganate as an alternative to SVE for the property.

With regard to the final item, it should be noted that UniFirst consultants have not concluded one way or the other whether the infiltration technology may be potentially useful at the UniFirst property. We do understand that the process has been pilot tested and found to be promising. In any event, we hope to be able to propose remediation of soil concentrations of PCE to 10 ppm, based on the rationale provided by the EPA's proposed corrective action rule, as a conservative cleanup level meant to protect endpoints other than groundwater.

If this letter accurately reflects the commitments that would allow you to withdraw the June 13, 1994 stop work order and related directives, then I commit that UniFirst will produce the report described. I also confirm, on behalf of UniFirst, that there no longer exists a dispute which must be addressed through the dispute resolution process under Section XX of the Consent Decree.

Thank you for your help in facilitating this constructive outcome for both parties. UniFirst looks forward to continuing the cooperative, pro-active working relationship that has characterized its interactions with the Agency at this site.

Sincerely,



Deirdre C. Menoyo

DCM:kme

cc: M. Gretchen Muench, Esq. ✓
Mr. Gary E. Augustyn
Jeffrey C. Bates, Esq.
Ms. Mary Garren
Mr. Jeffrey T. Lawson
Ms. Laura Moore

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